

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) KELI A. PUEBLO,

Plaintiff,

v.

(2) STATE OF OKLAHOMA, *ex rel.*,
OKLAHOMA SCHOOL OF
SCIENCE AND MATHEMATICS,
Defendant.

Case No.: 23-cv-654-J

PLAINTIFF’S FINAL WITNESS LIST

Pursuant to the Court’s Scheduling Order entered in the above-referenced case on April 29, 2024 [Dkt. 20], Plaintiff, Keli Pueblo, submits their Final Witness List as follows:

(Witnesses identified with an “*” indicates the witness may be called)

| | NAME/CONTACT | SUMMARY OF TESTIMONY |
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| 1 | Keli Pueblo* c/o Mazaheri Law Firm 3000 W. Memorial Road, Ste. 230 Oklahoma City, OK 73120 | Plaintiff has knowledge and facts as to her claim of discrimination and retaliation including her termination and any other adverse action or allegations that occurred during her employment and are alleged in her complaint. Plaintiff will testify to damages. |
| 2 | Dr. Frank Wang* 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Dr. Wang is the former President of OSSM and a current professor. Dr. Wang is believed to have knowledge of facts surrounding the Plaintiff’s employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. |

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| 3 | <p>Mr. Lynn Morgan*</p> <p>1141 N Lincoln Blvd</p> <p>Oklahoma City, OK 73104</p> <p>405-521-6436</p> <p>c/o Defense Counsel</p> | <p>Mr. Morgan is the former Vice President of OSSM. He is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. Mr. Morgan had numerous inappropriate romantic relationships with female subordinates. Mr. Morgan gave preferential treatment to female employees who engaged in romantic relationships with him.</p> |
| 4 | <p>Dr. Edna Manning*</p> <p>1141 N Lincoln Blvd</p> <p>Oklahoma City, OK 73104</p> <p>405-521-6436</p> <p>c/o Defense Counsel</p> | <p>Dr. Manning is the former two-time president of OSSM. She is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. Dr. Manning is also the individual who terminated the Plaintiff's employment at OSSM.</p> |
| 5 | <p>Shannon Gorbet*</p> <p>1141 N Lincoln Blvd</p> <p>Oklahoma City, OK 73104</p> <p>405-521-6436</p> <p>c/o Defense Counsel</p> | <p>Ms. Gorbet is the current CFO of OSSM. She is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination.</p> |
| 6 | <p>Amanda Bonnett*</p> <p>10304 W Esco</p> <p>Agra, OK 74824</p> | <p>Ms. Bonnett is the former Academic Counselor at OSSM. She is believed to have knowledge</p> |

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| | 405-401-5598 | of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, and retaliation. Ms. Bonnett resigned OSSM in 2022 because of ongoing concerns from parents regarding student safety and professor misconduct, often sexual in nature. |
| 7 | Linda Waters* 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Ms. Waters is the current Director of Public Information at OSSM. She is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. Ms. Waters was subject to threats of violence and retaliation by a male colleague who was promoted and highlighted after threatening Ms. Water's with physical harm. |
| 8 | Elizabeth Jacoby* 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Ms. Jacoby is the current executive assistant for Dr. Brent Richards, Vice President of Academic Services at OSSM. She is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. |
| 9 | Dr. Michelle McCargish* 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 | Dr. McCargish is a current professor at OSSM. She is believed to have knowledge of facts surrounding the Plaintiff's |

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| | c/o Defense Counsel | employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. McCargish took part in a group grievance filed against one male employee by six female employees. Dr. McCargish is believed to have knowledge regarding male employees drinking alcohol while driving and chaperoning students. |
| 10 | Dr. Janet Neufeld 918-855-0800 | Dr. Neufeld is the former Vice President of Academic Affairs. She is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation. |
| 11 | Dr. Angel Wilson* 11151 Springhollow Rd Apt 268 Oklahoma City, OK 73120 785-341-1269 | Dr. Wilson is the former Dean of Students at OSSM. She is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, and retaliation. Due to OSSM's discriminatory practices, Dr. Wilson was fired. |
| 12 | Carol Bennett 1341 Dragonfly Way Watkinsville, GA 30677 | Ms. Bennett is the former Residential Life Supervisor. She is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation. Ms. Bennett was fired from OSSM as a |

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| | | result of retaliation and was offered out of state relocation and reemployment assistance by former President, Dr. Frank Wang. |
| 13 | Laurie Webster 12301 Maiden Lane Oklahoma City, OK 73142 | Ms. Webster is the former Director of Public Information. She is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation. Ms. Webster was fired from OSSM due to retaliation for making complaints against the former VP of Administrative Services, Lynn Morgan. |
| 14 | Rebecca Morris* 18104 English Oak Lane Edmond, OK 73012 | Mrs. Morris is the former Director of Admissions and an OSSM alumni. She is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation. Mrs. Morris resigned from OSSM after a decade of unsuccessful attempts to improve living conditions at the school for female students and working conditions for female employees. Mrs. Morris' position was replaced by a male earning substantially more than she did at the time of her resignation. |
| 15 | Bill Kuehl* 2038 Lake Murray Blvd., Unit 6101 Columbia, SC 29212 405-510-6161 | Mr. Kuehl served as the Director of Admissions. Mr. Kuehl was the subject of an internal investigation regarding the complaints of five female employees, parents of |

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| | | female students, and the OSSM President Dr. Frank Wang and Governing Board members Dan Little and Donna Windel. |
| 16 | Greg Madden * 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Mr. Madden serves as the Director of Maintenance. Mr. Madden was the subject of numerous sexual harassment complaints from female colleagues, had consistently poor and performance reviews without consequence or demotion. |
| 17 | Mark Li 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Dr. Mark Li serves as a professor at OSSM. Dr. Li was the subject of numerous sexual harassment complaints from female employees and students. For years, Dr. Li was also the subject of sexual harassment complaints from teachers who attended workshops held at OSSM. |
| 18 | Jonathan Triplett 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Mr. Jonathan Triplett served as Residential Life Supervisor and later as Dean of Students. Mr. Triplett was the subject of numerous complaints from female employees, students and parents. Mr. Triplett was hired and later promoted despite multiple domestic violence related legal matters as well as a recent DUI. Mr. Triplett was instructed to complete anger management by Dr. Frank Wang. |
| 19 | Dr. Dutch Ratliff 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Dr. Dutch Ratliff served as a professor at OSSM. Dr. Ratliff was the subject of numerous complaints from female employees and students, including |

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| | | a sexually inappropriate test given as an assignment. Dr. Ratliff also displayed inappropriate behavior both in and out of the classroom as well as on trips he chaperoned and transported students. |
| 20 | Dr. Kurt Bachmann* 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 | Dr. Kurt Bachmann served as a professor at OSSM. Dr. Bachmann was the subject of numerous sexual harassment complaints from female employees and students for decades. |
| 21 | Donna Windel * 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Mrs. Donna Windel serves as an Executive Member of the OSSM Governing Board of Directors. Mrs. Windel participated in post-audit grievance filings of multiple female staff members. Mrs. Windel has a significant role in the making of policies and procedures at OSSM. Mrs. Windel is believed to have been involved in the creation of a nonpublic audit report of OSSM. |
| 22 | Dan Little* 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Mr. Little is the current Governing Board Chairman of OSSM, having held that position since 1992. He is believed to have extensive knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. Mr. Little is also believed to have been involved in the creation of a nonpublic audit report of OSSM. |
| 23 | Lance Benham * 1141 N Lincoln Blvd | Mr. Lance Benham serves as an Executive Member of the OSSM |

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| | Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Governing Board of Directors. Mr. Benham has a significant role in the making of policies and procedures of OSSM. Mr. Benham is believed to have been involved in the creation of a nonpublic audit report of OSSM. |
| 24 | Dr. Brent Richards* 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Dr. Brent Richards serves as the Vice President of Academic Affairs and is also an alumnus. He is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. |
| 25 | Pam Felactu* 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Ms. Pam Felactu served as Development Director of the OSSM Foundation as well as Keli Pueblo's immediate supervisor. Ms. Felactu is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. |
| 26 | Valerie Hiatt Pryor Middle School 7 S Hogan Street Pryor, OK 74361 918-728-5936 | Mrs. Hiatt served as the Residential Hall Coordinator. Mrs. Hiatt is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. Ms. Hiatt can also provide information regarding her departure from OSSM. |

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| 27 | Lynnsey Dickens 930 N. Patchin Avenue Shawnee, OK 74804 405-886-6698 | Mrs. Dickens served as OSSM Foundation Administrative Assistant. Mrs. Dickens resigned her position due to working conditions. Mrs. Dickens is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. |
| 28 | Dr. Amy Roberson 1141 N Lincoln Blvd Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Dr. Roberson serves as a professor at OSSM. Dr. Roberson is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. Dr. Roberson can also provide first-hand accounts of sexual harassment by male counterparts. |
| 29 | Susan Greenwood 1704 Mark Wood Street Midwest City, OK 73130 | Ms. Greenwood served as Development Assistant and was fired from her position. Ms. Greenwood is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. Mrs. Greenwood can also provide first-hand accounts of sexual inappropriateness and behavior. |
| 30 | Keith Forshee 1141 N Lincoln Blvd. | Mr. Forshee serves as Maintenance Technician and is |

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| | Oklahoma City, OK 73104 c/o Defense Counsel | believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. |
| 31 | Sara Brown* 12328 Cobblestone Court Oklahoma City, OK 73142 405-314-3009 | Mrs. Brown served as OSSM Foundation Board Chair for two years and worked very closely with Plaintiff. Mrs. Brown is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. |
| 32 | Geoffrey Simpson* 1141 N Lincoln Blvd. Oklahoma City, OK 73104 405-521-6436 c/o Defense Counsel | Mr. Simpson serves as a member of the Executive Committee of the Governing Board. Mr. Simpson has a significant role in the making of policies and procedures of OSSM. |
| 33 | Marilee Kuehl* 2038 Lake Murray Blvd., Unit 6101 Columbia, SC 29212 405-510-6161 | Mrs. Kuehl served as Administrative Assistant to her husband Mr. Bill Kuehl and can provide details regarding her departure. Mrs. Kuehl is believed to have knowledge of facts surrounding the Plaintiff's employment, gender discrimination, sex-based stereotypes, hostile work environment, retaliation, and termination. |
| 34 | Cindy Byrd 2300 N Lincoln Blvd., Suite 123 Oklahoma City, OK 73105 | Ms. Byrd can provide information regarding the 2019 State Auditor's Report and Findings. |

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| | 405-521-3495 | |
| 35 | Erica Beauford* 2300 N Lincoln Blvd., Suite 123 Oklahoma City, OK 73105 405-585-8172 | Ms. Beauford can provide information regarding the 2019 State Auditor's Report and Findings. Ms. Beauford can also provide information regarding Plaintiff's role in the operational audit portion. |
| 36 | Leslie Norrid OU Health, Adult Rehab Services 1000 N Lincoln Blvd., Suite 2A Oklahoma City, OK 73104 405-271-4152 | Ms. Norrid served as a house parent and is also the long-time girlfriend of Mr. Johnathan Triplett. Ms. Norrid can provide information regarding specific incidents involving both herself and Mr. Triplett on OSSM property. |
| 37 | Dr. Cary Carpenter* 15679 NE 23rd St Choctaw, OK 73020 405-390-9600 | Dr. Carpenter treated the Plaintiff for anxiety case by the actions of the Defendant. |
| 38 | Joseph Pueblo* 15957 Lasso Circle McLoud, OK 74851 405-882-9344 | Mr. Pueblo is the husband of the Plaintiff. He can speak about how the actions of the Defendant affected the Plaintiff and the damages she incurred. |
| 40 | E. Dani Quinones* Public Strategies 3 East Main Street Oklahoma City, OK 73104 405.848.2171 | Ms. Quinones works for Public Strategies as the Senior Talent Acquisition Manager. She tried to help the Plaintiff find employment after her termination but was unable to find a job for her. |
| | All witnesses listed by Defendant yet to be determined not objected to by Plaintiff. | |
| | Additional witnesses identified yet to be determined through discovery. | |

Respectfully submitted,

s/D. Alex Palmer

D. Alex Palmer, OBA 32847

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

A copy of Plaintiff's Final Witness List was electronically transmitted to the Clerk of the court using the ECF System for filing and transmittal of a Notice of Electronic filing to the following ECF registrants on this 5th day of August, 2024:

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s/D. Alex Palmer

D. Alex Palmer